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PARTNER

Via ECF

The Honorable Sarah L. Cave
U.S. Magistrate Judge
U.S. District Court, Southern District of New York
500 Pearl Street, Room 1670
New York, New York 10007

The Court is in receipt of Defendants' Letter-Motion seeking an adjournment of the February 7, 2025 deadline to submit a joint letter (the "Deadline"), in light of their anticipated motion to withdraw as counsel. (ECF No. 46 (the "Letter-Motion")). The Letter-Motion is GRANTED, and the Deadline is ADJOURNED SINE DIE. Plaintiffs may file by the Deadline a letter of their own setting forth their position as to the topics discussed in Court on January 29, 2025 and described in the Order at ECF No. 45.

The Clerk of Court is respectfully directed to close ECF No. 46.

SO ORDERED. 2/6/2025


SARAH L. CAVE
United States Magistrate Judge

Re: Defendants' Motion Requesting Adjournment of Time to File Joint Letter
Case: *Yesinia Uribe Rojo v. Lakeview Security & Investigations, Inc., et al.*
Case No.: 24-cv-05729 (JPO)(SLC)

Dear Judge Cave:

This law firm represents defendants, Lakeview Security & Investigations, Inc., Anthony D'Gracia, and Eric Scott (collectively, "Defendants"), in the above-referenced case. Pursuant to Rule I(D) of Your Honor's Individual Practices in Civil Cases, Defendants respectfully request that the February 7, 2025 deadline for the parties to file a joint letter regarding the Court's proposed changes to the Collective Notice contained in Plaintiff's pending motion for conditional collective certification [ECF Doc. Nos. 25-30] and their respective plans to proceed in this action [ECF Doc. No. 45] be adjourned *sine die*. Defendants submit this request because my law firm will be immediately filing an application by order to show cause within the next few days, requesting that my law firm be relieved as counsel for all Defendants in this case pursuant to Local Civil Rule 1.4.

Earlier today, my office contacted Plaintiff's counsel, Robert Kansao, Esq. requesting his position regarding this adjournment request. Mr. Kansao advised that Plaintiff objects to this request as Plaintiff intends on submitting a letter to Court by the February 7th deadline. This is Defendants' first request for an extension of the February 7th deadline for the parties to file their joint letter regarding the Court's proposed changes to the Collective Notice and their respective plans to proceed in this action.

We thank the Court for its time and consideration.

Respectfully submitted,
FORCHELLI DEEGAN TERRANA LLP

By: /s/ Keith J. Frank
Keith J. Frank, Esq.

cc: Counsel of Record (via ECF)